

Tiffany, Bruce

From: Stern, Jeff
Sent: Thursday, June 01, 2006 6:20 PM
To: Tiffany, Bruce
Subject: FW: EPA Comments on Reporting/Tracking Section of Slip 4 Action Plan

Bruce here is what EPA is proposing on the issue about the source control trigger to cleanup. Let me know what you think

-----Original Message-----

From: Jennie Goldberg [mailto:GoldbeJ@Seattle.Gov]
Sent: Wednesday, May 31, 2006 11:02 AM
To: Stern, Jeff
Subject: Fwd: EPA Comments on Reporting/Tracking Section of Slip 4 Action Plan

>>> <Keeley.Karen@epamail.epa.gov> 05/31 10:33 AM >>>
Dan -

Thanks for the opportunity to review Section 6. After reviewing the Source Control Strategy and checking in with the team, EPA recommends incorporating the following language into Section 6:

1st TM → Fall '06
2nd TM → Jan '07

Ecology, in coordination with the Source Control team for Slip 4, will submit to EPA a Technical Memorandum in Fall 2006, which will summarize and update source control actions that have been implemented since issuance of the Slip 4 Source Control Action Plan.

This Technical Memorandum will report on the status of sources listed in Tables ES-1 and ES-2 and any new sources identified, and will describe any known issues that may adversely affect the schedule established for source control decisions regarding the Slip 4 sediment cleanup.

Ecology, in coordination with the Source Control team for Slip 4, will submit to EPA a second Technical Memorandum in January 2007, which will summarize and update source control actions that have been implemented since completion of the first Technical Memorandum.

This Technical Memorandum will include a recommendation on whether sources are adequately controlled such that construction of the Slip 4 removal action can occur with minimal potential for recontamination of Slip 4 sediments. The memorandum may include a discussion of the uncertainties associated with the recommendation, and may identify requirements for ongoing monitoring or control as appropriate. EPA will review and concur with this recommendation before implementation of the Slip 4 sediment cleanup.

Following EPA and Ecology's assessment and before implementing cleanup actions the City of Seattle and King County will also consider whether or not source control action is adequate.) (?

This language addresses the imminent question "Is source control complete enough for the remedial action to go forward?" For Slip 4, Sheila/Allison/Kris all concurred that Ecology should make a written recommendation to EPA re: whether source control is adequate enough. Kris indicated that the dates proposed above are consistent with dates

she has discussed with you at source control meetings. As set forth in the strategy, EPA will review and concur on Ecology's recommendation.

This language does not address the second question of whether all known source control actions (e.g., all the paperwork) is "done" for Slip 4 sources. I am not proposing that language be added to the Action Plan with regards to this second question because it is not immediately necessary and it is my understanding that this issue is being addressed/considered in the broad source control discussions among Ecology, Allison, Sheila, and Kris.

Please let me know if this language works for you. I am in all day today and have no meetings!

Thanks,

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To

gov>

Karen Keeley/R10/USEPA/US@EPA

cc

05/25/2006 11:38

AM

Subject

Comments?

6.0 Tracking and Reporting of Source Control Activities

Ecology is the lead for tracking, documenting, and reporting the status

of source control to EPA. The agency performing the source control work will document their activities and provide reports to Ecology. Ecology will prepare waterway-wide and basin-specific reports for EPA and the public. Please refer to the Lower Duwamish Source Control Strategy for further details (Ecology 2004).

Ecology is developing a database for tracking known or potential sources of recontamination. The database will be used to track all sources identified in this plan as well as past and future source control plans.

Ecology will use the database to prepare semi-annual reports documenting source control actions. Ecology will submit the reports to EPA. Ecology will prepare the first report in September 2006.

Ecology will add all new sources of contamination not covered by this plan to the database. The status of actions in this plan and any new sources will be discussed in the semi-annual reports. Ecology won't publish a revised source control plan.

Ecology will consult with EPA before the sediment cleanup begins. Ecology and EPA will decide if source control is adequate to minimize the potential for recontamination of sediments. Following EPA and Ecology's assessment and before implementing cleanup actions the city of Seattle and King County will also consider whether or not source control action is adequate.

Dan
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